

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

CHRISTINE BRYANT on behalf of herself)
and all other persons similarly situated, known)
and unknown,)
)
Plaintiff,)
) Case No. _____
vs.)
)
COMPASS GROUP USA, INC.)
)
Defendant.)

DECLARATION OF SCOTT DEVINE IN SUPPORT OF NOTICE OF REMOVAL

I, Scott Devine, declare as follows:

1. I am a citizen of the United States and I am over 21 years of age. I have personal knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.
2. I am employed by Compass Group USA, Inc. (“Compass Group”). My job title is Director of Innovative Retail Solutions, and I have held this position since June 2016.
3. Compass Group operates “Smart Market” unmanned kiosks throughout the United States, including in Illinois. At Smart Markets, customers can purchase warm and refrigerated food and beverage items. Customers may create and fund an account in order to make purchases. When an account is created, customers have the option of accessing their account by placing their thumb or finger on a device. Once an account is created, customers pay for items by accessing their accounts and scanning the items’ barcodes on a reader.
4. Based on my review of Compass Group’s records, there are at least 1,000 registered users of the Smart Markets located in Illinois who have accessed their Smart Market accounts by placing their thumb or finger on a device.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 4, 2019.

By: /s/ Scott Devine